

IN THE UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF DELAWARE

CRYSTALLEX INTERNATIONAL )  
CORP., Plaintiff, )  
v. )  
BOLIVARIAN REPUBLIC OF ) No. 1:17-mc-00151-LPS  
VENEZUELA, )  
Defendant. )

**NOTICE OF PENDING MOTION TO REINSTATE THIRD CIRCUIT APPEAL  
AND CHANGED CIRCUMSTANCES**

January 3, 2026

Movant Leroy A. Garrett, pro se, respectfully notifies the Court of the following:

1. Creditors have docketed the Third Circuit's December 30, 2025 administrative dismissal of Appeal No. 25-3323 (D.I. 2605).
2. On the same day (December 30, 2025), Movant filed a Motion to Reinstate the Appeal and to Proceed In Forma Pauperis in the Third Circuit (Documents 28-1 and 28-2), highlighting administrative inconsistencies (unilateral docketing without prior fee demand) and documented indigence. The appeal remains pending reinstatement, preserving appellate review of Movant's unrebuted equitable claims.
3. On January 3, 2026, Nicolás Maduro was captured by U.S. forces, ending the regime responsible for the 2002–2003 political purge. This eliminates regime retaliation risk and removes any remaining justification for excluding the 23,000 victims from reparations.

These developments constitute changed circumstances warranting immediate consideration of a limited Qualified Settlement Fund reserve (D.I. 2561 and supplement) to ensure clean title for the purchaser and prevent successor-liability litigation risk.

Movant requests an indicative ruling or brief status conference.

Respectfully submitted,



Dr. Leroy A. Garrett

Interested Party with Entry of Appearance

Pro Se Attorney

6725 S Fry Road Ste. 700-338. Katy Texas 77494